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EX PARTE OR LATE FILED

Celia Nogales
Director - Federal Relations

April 15, 1998

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

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APR 15 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **Ex Parte Presentation**
CC Docket 92-237

Dear Ms. Salas:

The attached letter was sent to Ms. Renee Alexander, Network Services Division, on April 14, 1998 and should be entered in the record of the above referenced proceeding.

Sincerely,

A handwritten signature in cursive script that reads "Celia Nogales".

Attachment

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Renee Alexander
Network Services Division
Federal Communications Commission
2000 M Street, NW
Room 235
Washington, DC 20554

Re: **Ex Parte Presentation**
CC Docket 92-237

Dear Ms. Alexander:

On Thursday, April 9, 1998, Ameritech provided information to the Commission via an ex parte regarding the conversion from 3 to 4 digit Carrier Identification Codes (CICs) associated with CC Docket 92-237. Below is supplemental information regarding the "LEC operational transition period" associated with the conversion from 3 - Digit CIC/5 Digit CAC dialing to 4 - Digit CIC/7 - Digit CAC dialing. Specifically, the information addresses whether there is a similar transition period required for area code splits. Lastly, information is provided to address specific questions raised regarding preprogramming certain translations functions.

In short, area code split projects also include a "LEC operational transition period" which require similar activities to fully complete the conversion to the mandatory dialing pattern. The most important similarity between the CIC dialing change and area code splits is public education. The educational material must clearly identify when the permissive dialing period begins and ends. Public education of these critical dates and dialing pattern changes is required to successfully implement the project.

Both projects are similar in that during the permissive dialing period, calls will complete using the "new" or "old" dialing pattern. In the case of an area code split, both the existing area code and the proposed new area code can be dialed by customers during the permissive dialing period and the call will complete. Similarly, in the permissive dialing period associated with CIC conversion, customers can dial 10XXX or 101XXXX and the call will complete as dialed.

Below is a list of generic steps associated with area code splits and the pending CIC conversion that highlight the similarities in work that is required.

Ms. Renee Alexander
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Generic steps immediately following end of permissive dialing period (Area Code Splits):

- 1) Change translations in switches in the "effected area" (probably within one LATA) to direct calls dialed "incorrectly" to educational announcement.
- 2) Test and verify that translation changes are indeed functioning as designed.

General comments associated with area code splits:

Depending on the scope of the project, these activities could take a number of weeks to complete. These activities are not flash cut on a single day.

This is standard operating procedure in our region. Please note that this "LEC operational transition period" is not broadcast to the general public in order to avoid public confusion. However, it is understood internally and by our state Commissions that it is a necessary step to successfully and reliably implement a new area code.

Generic steps immediately following end of permissive dialing period (CIC conversion)

- 1) Provision network with an educational announcement to be played to customers when they dial a 3 digit CIC that instructs them to dial a 4 digit CIC (e.g., the new dialing pattern).
- 2) Change translations in all switches in the region to direct calls dialed using a 3 digit CIC to educational announcement.
- 3) Test and verify that translation changes are indeed functioning as designed. At Ameritech, we will conduct a battery of tests that verify that calls dialed using a 3 digit CIC are directed to the educational announcement

General comments associated with CIC transition:

The steps outlined above are scheduled to take approximately 2 months to complete.

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General Conclusions:

The steps included in the "LEC operational transition period" are not subject to public debate in area code split projects. Therefore, the fact the the FCC Order did not include a discussion and/or associated ordering clauses in its Order didn't raise any questions internally. To the contrary, we would have been concerned if the Order had addressed them. We maintain that the single most important step remaining with the CIC conversion project is carrier public education regarding the permissive dialing period. By design, the public educational material and Commission Order does not need to address (nor should address) the "clean up steps". To do so would only invite public confusion.

Benefits associated with the "LEC operational transition period":

- 1) Blocking of 3 digit CICs is planned to be accomplished in a phased processing which will result in customer dialing "problems" being identified over time. This allows time for customers to be educated over time instead of facing a crisis the day after a "flash cut". The practical result is that this action will substantially reduce the probably of a glut of calls being placed to LEC and IXC repair bureaus on a single day.
- 2) The transition period acts as a "buffer" for customers who have not been fully educated on the new dialing pattern. This allows carriers and customers additional time to correct any problems that surface after the publicized end of the permissive dialing period.

Preprogramming issues:

The last issue raised dealt with preprogramming certain translations. Our network is capable of some preprogramming functions. However, this isn't the critical link. Rather, testing that the translation changes have indeed been installed correctly and haven't caused any other problems in the switch is viewed as much more critical. This work is estimated to take up to 1/2 hour per switch and can only be performed after the translation changes have been activated in the switch.

If you have any additional questions regarding this matter, please contact me at 202-326-3810.

Sincerely,

Celia Nogales

Celia Nogales
Director - Federal Relations

cc: G. Matise